

# EXHIBIT 94

[Page 1]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

PEGGY ROIF ROTSTAIN, )  
Et al., on Behalf of )  
themselves and all others )  
similar situated, )  
Plaintiffs, )  
and )  
THE OFFICIAL STANFORD )  
INVESTORS COMMITTEE, ) CASE NO.  
Plaintiff-Intervenor, ) 3:09-CV-02384-N  
-against- )  
TRUSTMARK NATIONAL BANK, )  
HSBC BANK PLC, THE )  
TORONTO-DOMINION BANK, )  
INDEPENDENT BANK f/k/a )  
BANK OF HOUSTON, SG )  
PRIVATE BANKING (SUISSE) )  
S.A., and BLAISE FRIEDLI, )  
Defendants. )

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ORAL AND VIDEOTAPED DEPOSITION OF

DIANA SUAREZ

August 28, 2015

VOLUME 2

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1 Q. And after your last deposition, did you search  
2 for any additional documents relating to Stanford in  
3 connection with this case?

4 A. No. After -- after the -- my Yahoo! account  
5 was recovered, and I gave my lawyers, you know, the --  
6 the e-mails, I haven't done anything.

7 Q. And did you give those e-mails before or after  
8 July 1st, when you were deposed?

9 A. Just the day before.

10 Q. Day before.

11 And did you look for any documents in  
12 e-mail account labeled aaaa@bbbb.com at any point after  
13 your deposition?

14 A. Oh, no.

15 Q. Did you look for e-mails in that account before  
16 your deposition?

17 A. You mean --

18 Q. Before your July 1st deposition.

19 A. No.

20 Q. And does this e-mail account contain any  
21 e-mails you think relevant to this action?

22 A. No.

23 Q. Do you recall testifying in your last  
24 deposition that this e-mail account may have had  
25 relevant e-mails?

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1 used it with my Yahoo! account always joint together.

2 Q. And when you say they were joined together, do  
3 you mean all of the e-mails in the bbbb.com account or  
4 in your Yahoo! account?

5 A. Yes.

6 Q. And there would be -- or would there be any  
7 documents or e-mails in your bbbb.com account that are  
8 not in your Yahoo! account?

9 A. No.

10 MR. SWANSON: Actually, I think Van, who  
11 is not here, but he probably will be later. We looked  
12 into that at some point. I wish I could tell you what,  
13 but I don't know. He does know, so when he gets here,  
14 maybe we can get you a little more information on what  
15 we did to be sure that there was nothing that was  
16 relevant that was in a different account.

17 MS. SIVASHANKER: Great. Thank you.

18 MR. SWANSON: Yeah.

19 Q. (By Ms. Sivashanker) And going back to --  
20 after your July 1st deposition, did you look for -- I  
21 know you mentioned that you produced e-mails from your  
22 Yahoo! account the night before the deposition.

23 Did you provide any other documents to  
24 your counsel after the deposition?

25 A. No.

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1 it have to be after -- after the -- the fraud, because I  
2 was always willing to pay taxes and I wanted all my --  
3 my -- my papers and my -- to be correct, to be -- so I  
4 didn't know.

5 Q. So you think you gained an understanding of  
6 this term sometime after February 2009?

7 A. Yeah.

8 Q. But you didn't understand this term before that  
9 date?

10 A. No.

11 Q. And Ms. Suarez, you mentioned the tax returns.

12 Did you file -- when you filed your tax  
13 returns, did you report the interest that you earned on  
14 your Stanford CD investments on your tax returns?

15 A. Okay. All the -- all the information that I  
16 have for my accounts and the interest rates and what I  
17 was gaining from the accounts, I gave everything to my  
18 husband. He was the one -- they were married the day he  
19 died. I -- he did all the -- the taxes, and I never  
20 really knew what was going on or anything.

21 Q. So you don't know if you reported the interest  
22 earned on your Stanford CDs on those tax returns?

23 A. When I was looking at the tax returns, yes, we  
24 did two years, I think. And then in the 2007 for -- I  
25 don't know what reasons he didn't do it.

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1 Q. Sorry. Just to make sure I understand.

2 So you said for two years, he --

3 A. I think. I'm not sure.

4 Q. And for two years, he did the tax returns or  
5 you did the tax returns?

6 A. No. He did the tax returns all the time.

7 Q. And what were those two years that he did the  
8 tax returns?

9 MR. SWANSON: Object to the form. She  
10 said he did the tax returns on all the years. You just  
11 said two years.

12 A. Since we marry in 1972.

13 Q. (By Ms. Sivashanker) So just to make sure I  
14 understand, you mentioned two years. You don't know why  
15 he didn't do it.

16 What were you referencing there for the  
17 two years?

18 A. Oh, two years? Did I say that? I'm sorry.

19 But I should use the translator.

20 (Through interpreter) Wait. My husband  
21 did the taxes ever since we got married in 1972, 1971,  
22 until the day he died in 2014. Going back and reviewing  
23 the tax documents over these last years regarding to --  
24 regarding the interest accrued, I saw that in the year  
25 2007, the interest was not declared. I spoke about this

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1 with my son, Gabriel. My husband had already died, and  
2 we believe that it was the accounting firm were the ones  
3 that did not declare those taxes. We don't know why.  
4 That's it.

5 Q. To make sure I understand, so in 2007, the  
6 interest was not declared on the tax returns, correct?

7 A. Correct.

8 Q. And were there any other years, other than  
9 2007, where the interest from the Stanford investments  
10 was not declared on the tax returns?

11 A. I couldn't find any of that in the -- in the  
12 tax returns, so I don't know.

13 Q. And when you say you couldn't find any of that,  
14 you didn't see the interest reported in any of the other  
15 tax returns?

16 A. The only tax returns that I didn't see the  
17 interest report was in 2007. We didn't pay anything for  
18 the -- I don't know if that's the way -- this is the  
19 first year that I'm doing my taxes here in the states by  
20 myself now that I'm a widow, so I'm getting used to all  
21 the -- the tax returns and everything.

22 Q. When did you start doing the taxes on your own?

23 A. Last -- this year, 2000 --

24 Q. '15?

25 A. No, '15.

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1 Q. So in '14 --

2 A. Yeah, I did.

3 Q. So in 2014, you started doing your own tax  
4 returns?

5 A. Yeah. When my -- my husband died.

6 Q. And you had mentioned or previously testified  
7 about an accounting firm preparing the tax returns  
8 previously.

9 Which accounting firm was this?

10 A. Oh, I don't remember the name right now.

11 Q. Do you know where the accounting firm is  
12 located?

13 A. It's located in Miami, but I don't remember the  
14 name.

15 Q. And so this was the firm that worked with you  
16 for the US tax returns or worked with your husband?

17 A. With my husband for awhile.

18 Q. Were any other accounting firms used?

19 A. I don't really know. Like I say before, he was  
20 the one that took care of all the financial things in  
21 our family.

22 Q. Have you filed any amended tax returns for

23 2007?

24 A. I don't know what you're talking about.

25 Q. So you previously just testified that you

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1 learned that the interest for your Stanford CD  
2 investments were not declared on your 2007 tax returns,  
3 correct?

4 A. Correct.

5 Q. Did you file an amendment once you learned  
6 about information -- or I'm sorry.

7 Once you learned that information, did you  
8 file an amended tax return for 2007?

9 A. Okay. What I did is, the past two years, I  
10 went to H&R Block and I gave all the information they  
11 wanted and they did my taxes, and I pay what I had to  
12 pay.

13 Q. And did H&R Block file an amended tax returns  
14 for prior years?

15 A. I don't know. I have to go and see the files.

16 Q. You're not aware if they filed?

17 A. I don't know.

18 Q. And did you ask them to file an amended return,  
19 if anything?

20 A. I gave all -- I told them about all these  
21 problems and I gave them all the information they  
22 needed.

23 Q. And did you mention to them that you were aware  
24 that the interest had not been declared on your 2007 tax  
25 return for your Stanford investment?

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1 A. Yes, I did.

2 (Exhibit 142 was marked.)

3 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to  
4 give you what's been marked as Exhibit 142. This is an  
5 e-mail that, again, has a Spanish version in front with  
6 the English translation behind it with a certificate of  
7 accuracy behind that.

8 If you look at the English translation, it  
9 is Bates-numbered SUAREZ\_685 to SUAREZ\_686. It is an  
10 e-mail chain and the top e-mail is from Diana Suarez to  
11 Maria Villanueva, dated July 28, 2008.

12 Ms. Suarez, if you're looking at this  
13 e-mail, again, the bottom Bates number is 685.

14 Do you recognize this e-mail?

15 A. Yes, I do.

16 Q. And if you look at the very bottom e-mail,  
17 again, on the right-hand side on the bottom page, it's  
18 685, so it's the very bottom e-mail on that page.

19 Do you see that there's an e-mail from  
20 Diana Suarez to, again, AA.

21 Do you see that?

22 A. Yes.

23 Q. And if you look at that e-mail, you write: I  
24 would like to get information about the procedure to be  
25 followed to make a withdrawal from my [REDACTED],

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1 before its maturity in September 2008 without penalties.

2 That is what amount can be withdrawn and transferred

3 into my Bank of America account.

4 Do you see that language?

5 A. Yes, I do.

6 Q. Why were you asking about information about how

7 to make a withdrawal here?

8 A. Because my husband had a nervous breakdown and

9 we needed the money for his -- his problem.

10 Q. And you were trying to transfer this amount for

11 your husband, Juan, correct?

12 A. Yes.

13 Q. Into your Bank of America account, correct?

14 A. Yes.

15 Q. And then were you hoping to transfer that

16 amount from Bank of America -- your Bank of America to

17 Juan afterwards?

18 A. Yes.

19 Q. And in the next e-mail, you'll see, again, on

20 the bottom right-hand page, it's 685, if you stay on the

21 685 page. In the very middle, there's an e-mail from

22 Maria Villanueva to [REDACTED].

23 Do you see that e-mail?

24 A. The one in the middle, yeah.

25 Q. And is this your Yahoo! e-mail address?

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1 A. Yes.

2 Q. And Maria writes: You can withdraw 25 percent  
3 of the amount in the flex during the term of your  
4 certificate. That means that if the term is one year,  
5 you can withdraw up to 25 percent without penalty in  
6 that year.

7 Do you see that language?

8 A. Yes.

9 Q. Was this the first time that you had asked  
10 Maria about making a withdrawal from your Stanford flex  
11 account?

12 A. I think so.

13 Q. And had you made -- and in terms of this  
14 amount, this would be a withdrawal that you were asking  
15 about -- a withdrawal of principal, correct, from your  
16 Stanford account?

17 A. Yes.

18 Q. And do you recall previously testifying that  
19 the only withdrawals that you made from your account  
20 were monthly interest withdrawals and no other amounts?

21 A. Yes, I testified that.

22 Q. But you agree that this amount that you were  
23 seeking to withdraw was a withdrawal of principal,  
24 correct?

25 A. Yes.

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1 Q. And if I look again at the very top e-mail on  
2 the bottom right-hand page of 685, you'll see it's an  
3 e-mail from you, Diana Suarez to Maria Villanueva,  
4 correct?

5 It's the very top e-mail on this page.

6 A. In the --

7 Q. It's the page Bates-numbered on the right, 685.

8 A. Okay.

9 Q. And in this e-mail, she writes: The amount to  
10 be withdrawn from the [REDACTED] and  
11 deposited into my Bank of America [REDACTED]  
[REDACTED], correct?

13 A. Correct.

14 Q. And this is [REDACTED], correct?

15 A. Yes. Correct.

16 Q. And so this [REDACTED] withdrawal was being  
17 made for Juan, your husband, correct?

18 A. Yes.

19 Q. And would you agree that since this was a  
20 withdrawal of principal, that your prior testimony, that  
21 the only withdrawals you had made from your Stanford  
22 account was interest was inaccurate?

23 A. Yes. I -- I can say that, but I'm going to --  
24 I didn't remember --

25 Q. But you would agree that --

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1 A. -- the withdrawal.

2 Q. But you would agree the prior testimony was not  
3 accurate?

4 A. Yes.

5 (Exhibit 143 was marked.)

6 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to  
7 give you what's now been marked as Exhibit 143. Again,  
8 this is a set of -- this is an e-mail chain where there  
9 is a Spanish language version in the front and the  
10 English language behind it that's been translated with a  
11 certificate of accuracy behind that.

12 This e-mail chain, the top e-mail is from  
13 Diana Suarez to Maria Villanueva. It's dated August 7,  
14 2008, and it's Bates-numbered SUAREZ\_726 through  
15 SUAREZ\_730.

16 Ms. Suarez, do you remember this e-mail?

17 A. Yes, I do.

18 Q. And what does it generally discuss?

19 A. I'm asking Maria about the transfer because he  
20 is really in -- he's having problems and he needed the  
21 money and I wanted her to tell me what happened to the  
22 transfer so I could answer Juan, and I said: Appears to  
23 me that it is very urgent. And I was being polite in  
24 saying that I -- thank you very much for -- for all your  
25 job. I mean, everything you're doing.

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1 Q. And previously, you had testified that you did  
2 not have a certificate -- original certificate for the  
3 September 6th, 2006 CD.

4 Do you recall that?

5 A. September 6th, 2000 --

6 Q. -- 6.

7 A. Uh-huh, yes.

8 Q. Did you have that certificate at the time of  
9 this e-mail in May 25th, 2009?

10 A. I was missing one and I don't remember which  
11 one was it.

12 Q. So even on May 25th, 2009, you were missing one  
13 certificate?

14 A. Yes.

15 (Exhibit 150 was marked.)

16 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to  
17 hand you what's been marked as Exhibit 150. This is an  
18 e-mail. It is dated March 12th, 2013. It is an e-mail  
19 chain, the top e-mail is dated March 12, 2013. It's  
20 from Gabriel Suarez to stanfordclaims.support@uk.tt.com  
21 and it copies Diana Suarez. It is Bates-numbered  
22 SUAREZ\_001248 to SUAREZ\_001250.

23 Ms. Suarez, do you recognize this  
24 document?

25 A. Yes.

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1 Q. And can you tell us generally what this  
2 document is?

3 A. This document, exactly what it says here, proof  
4 of debt to claim form.

5 Q. So this is the proof of debt claim form that  
6 was submitted to the joint liquidators, correct?

7 A. Exactly.

8 Q. And do you know why this document was not  
9 produced to us prior to your last deposition?

10 A. This -- this wasn't? I didn't know. No.  
11 Maybe because it wasn't in -- in the Yahoo! account, I  
12 have the -- the copy.

13 Q. And were additional e-mails collected from your  
14 Yahoo! account after your last deposition?

15 A. No. No.

16 MR. SWANSON: I think if you'd been at the  
17 last deposition, you'd know that we didn't produce all  
18 the e-mails before the last deposition, so this is  
19 probably one of the many that wasn't produced because we  
20 got them the day before.

21 MS. SIVASHANKER: Okay.

22 Q. (By Ms. Sivashanker) And, Ms. Suarez, if you  
23 look at the bottom e-mail on Page 1248, you'll see it's  
24 from Stanford claim support, and it's signed by the  
25 joint liquidators, Marcus Wide and Hugh Dickson. And it

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1 writes: Dear sir/madam, we acknowledge your proof of  
2 debt claim form. However, please note that all four  
3 signatures presented does not match the specimen in our  
4 records.

## 5 Do you see that language?

6 A. Yes, I do.

7 Q. And if you look at the e-mail right above it  
8 from Gabriel Suarez copying you to Stanford claim  
9 support, it writes: Attached is the requested  
10 signature page for the proof of debt. The quality of  
11 the documents is somewhat reduced because of the  
12 scanning.

### 13 Do you see that language?

14 A. Yes.

15 Q. And on this e-mail, your son, Gabriel Suarez,  
16 is listed as a sender, correct?

**17**      **A.**      **Yes.**

18 Q. And if you turn to the next page of the  
19 document, the attachment, which is Bates-numbered 1250,  
20 the attachment is a signature page, correct?

**21**                   **A.**           **Yes.**

22 Q. And is this your signature on this document?

**23**      **A.**      **Yes.**

24 Q. And did you print your name on this page?

25 A. Yes.

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1 Q. And did you -- did you date this document

2 March 11, 2013?

3 A. Yes.

4 Q. And are these -- is this a signature of your  
5 son, Eduardo Suarez?

6 A. I think so.

7 Q. And is this a signature of your son, Daniel  
8 Suarez?

9 A. I think so.

10 Q. And is this your signature of your son, Gabriel  
11 Suarez?

12 A. Yes, I think so, uh-huh.

13 Q. Do you recall in your prior deposition  
14 testifying that you had signed the proof of debt form  
15 submitted in February of 2013?

16 A. Could you please --

17 Q. In your prior deposition --

18 A. You're speaking too fast.

19 Q. I'll try to slow down for you.

20 In your prior deposition, do you recall  
21 previously testifying that you had signed the proof of  
22 debt form to the joint liquidators which was submitted  
23 in February of 2013?

24 A. Yes.

25 Q. Now, seeing this e-mail from the joint

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1 liquidators discussing how the signatures presented did  
2 not match their records, do you agree now that you did  
3 not sign the February 2013 form that was submitted to  
4 the joint liquidators?

5 A. Yes.

6 Q. So you would agree that your prior testimony  
7 that you had signed the February 2013 form to the joint  
8 liquidators was not correct?

9 A. Yes.

10 Q. And do you know what signature the joint  
11 liquidators had on file for you that did not match the  
12 signatures provided?

13 A. No, I don't know.

14 Q. And in addition to the proof of debt claim  
15 form, have you submitted any other documents to the  
16 joint liquidators?

17 A. I don't remember.

18 Q. And were there any other communications that  
19 you recall after this communication from the joint  
20 liquidators regarding issues provided by signatures by  
21 you?

22 A. I don't remember. And by this time, I gave all  
23 the power to my son, Gabriel. I gave him the power of  
24 attorney and everything, so he could act in my behalf.

25 Q. And you mentioned this power of attorney.

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1                   When did you give the power of attorney to  
2                   your son, Gabriel Suarez?

3                   A.    Oh, my God. I have to remember when I did  
4                   that. It was -- I don't remember exactly the date. It  
5                   was one of my trips to Miami.

6                   Q.    And do you recall if it was after March of  
7                   2013?

8                   A.    I don't recall.

9                   Q.    And what did the power of attorney provide  
10                  Gabriel with the power to do?

11                  A.    To do everything that have to be done in my  
12                  behalf.

13                  Q.    And you say everything that had to be done on  
14                  your behalf. Did that include everything relating to  
15                  your Stanford investments?

16                  A.    Everything.

17                  Q.    And has that power of attorney, is it still in  
18                  operation right -- today?

19                  A.    Yes.

20                  Q.    But you don't recall when you first gave it to  
21                  Gabriel Suarez?

22                  A.    No, not exactly the date.

23                  Q.    And do you know if you provided a copy of that  
24                  power of attorney to your counsel?

25                  A.    No, I didn't.

[Page 116]

1 A. Yes.

2 Q. And then below that, you see [REDACTED]

3 [REDACTED], correct?

4 A. Yes, correct.

5 Q. And you had previously testified that your --  
6 that this was the account for your express account,  
7 correct?

8 A. Correct.

9 Q. And if you look right below that after that,  
10 you see another account number listed towards the bottom  
11 of the page, which is 1171. It's [REDACTED],  
12 correct?

13 A. Correct.

14 Q. And the [REDACTED], this was for the first  
15 CD that was issued to you on March 6, 2006, correct?

16 A. Correct.

17 Q. And this was the flex CD account, correct?

18 A. Right.

19 Q. If you turn to the next page -- actually,  
20 sorry.

21 If you stay on Page 1171, you will see  
22 that underneath the [REDACTED], there's three  
23 columns, correct?

24 A. Yes.

25 Q. And there's two columns that are listed

[Page 117]

1 Deposits and Payments, correct?

2 A. Correct.

3 Q. Okay. Now, if you turn to the next page, which  
4 is 1172, if you go all the way down to the July 6, 2007  
5 transaction.

6 A. July?

7 Q. July 6, 2007 transaction.

8 A. Okay. Yes.

9 Q. And if you look at the very last column on the  
10 very right, you see an amount of REDACTED listed,  
11 correct?

12 A. Correct.

13 Q. And this is listed in the payments column,  
14 correct?

15 A. Correct.

16 Q. And payments are withdrawals from the account,  
17 correct?

18 A. Correct.

19 Q. So you would agree that on July 6th, 2007, a  
20 REDACTED withdrawal was made from your flex CD account,  
21 correct?

22 A. That's what it says here, but I don't remember.

23 Q. But you would agree, the document shows a  
24 transaction on REDACTED as a withdrawal on July 6, 2007,  
25 correct?

[Page 118]

1 A. Yes.

2 Q. And if you go a little bit farther down to  
3 August 7, 2008.

4 A. Yes.

5 Q. On the very right hand, again, the last column  
6 on the right, it lists an amount of **REDACTED**, correct?

7 A. Correct.

8 Q. And this amount of **REDACTED** is listed in the  
9 payments column, correct?

10 A. Correct.

11 Q. So this **REDACTED** was also another withdrawal  
12 from a flex account, correct?

13 A. Correct.

14 Q. So going back to the **REDACTED** withdrawal, do you  
15 know who this withdrawal was made for?

16 A. I don't recall, but I think it was to go from  
17 one account to the other account.

18 Q. Do you recall which accounts it was going  
19 between?

20 A. No. No.

21 Q. But you would agree, this would have been a  
22 withdrawal from your Stanford account to another bank  
23 account, correct?

24 A. To another Stanford account, the **REDACTED**.

25 Q. So you think it might be to another Stanford

[Page 119]

1 account?

2 A. Yes. Another CD.

3 Q. Okay. If you turn back to the prior page,

4 1171, you'll see this is for [REDACTED],

5 correct?

6 This is the exchange account we were

7 talking about earlier?

8 A. This one.

9 Q. Right.

10 A. Uh-huh. Yes.

11 Q. Do you see any amounts of [REDACTED] being  
12 deposited into this account on the date of July 6, 2007?

13 A. No.

14 Q. And you don't see any amounts of [REDACTED] being  
15 deposited into this account after July 6, 2007, correct?

16 A. Correct.

17 Q. And then if you go back to the Page 1172 and  
18 you look at the very bottom, it lists [REDACTED]  
[REDACTED], correct?

20 A. Correct.

21 Q. And you previously testified, this is your  
22 account for your fixed CD, correct?

23 A. Correct.

24 Q. And if you look to the transaction detail  
25 underneath this account, again, you don't see any

[Page 120]

1       deposits into this account for [REDACTED] on July 6th,  
2       2007, correct?

3           A.    Correct.

4           Q.    And if you turn to the next page, you don't see  
5       any deposits into this account for [REDACTED], into this  
6       account at any point, correct?

7           A.    Correct.

8           Q.    And so for the -- would you agree, then, that  
9       these are the three accounts, correct, that you had with  
10      Stanford?

11       A.    Yes.

12       Q.    And so none of these show a deposit of [REDACTED]  
13       [REDACTED], correct?

14       A.    Correct.

15       Q.    So would you agree that the [REDACTED] was a  
16       transfer from your Stanford account to another  
17       non-Stanford account?

18       A.    If that says here, it have to be that way.

19       Q.    And then for the [REDACTED] withdrawal, do you  
20       know what this withdrawal was for on August 7th, 2008?

21       A.    That amount was the one that we were talking  
22       before.

23       Q.    And was this the amount we were discussing in  
24       regards to sending money to Juan, your husband?

25       A.    Exactly.

[Page 131]

1 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to  
2 hand you what's been marked now as Exhibit 154, and this  
3 is a document titled Certification Form. The Bates  
4 numbering is STANFORD\_TDBANK000366 to  
5 STANFORD\_TDBANK000367.

6 Ms. Suarez, do you recognize this  
7 document?

8 A. I don't -- I don't -- I don't remember, but  
9 like I said before many, many times, I don't remember a  
10 lot of these documents.

11 Q. And if you go to the last page of the document,  
12 you will see that there are four signatures there.

13 Do you see your printed name, Diana  
14 Suarez?

15 A. Yes.

16 Q. Did you sign this document?

17 A. Yes.

18 Q. And if you turn back to the first page, you  
19 will see in the first line numbered 1, it says: Please  
20 fill in all the following bubbles that apply to you. I  
21 have not applied for, asserted a claim for or received  
22 compensation for any part of my total claim amount from  
23 any source other than the receivership.

24 Do you see that language?

25 A. Yes.

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1 Q. And you see that this language was selected on  
2 the form as the option being selected, correct?

3 A. Yes.

4 Q. And you previously testified that you did  
5 submit a claim to the joint liquidators, correct?

6 A. Yes.

7 Q. Do you know why you didn't indicate that on  
8 this form?

9 A. I don't know. No.

10 Q. And do you agree that that information should  
11 have been listed on the form?

12 A. Let me read them again.

13 (Witness perusing document.)

14 Well, I don't know what to say about it  
15 because, like I said before many times, my son was the  
16 one who was doing this and he just say, you know, sign  
17 here and I did.

18 Q. So you think that your son filled the form out  
19 incorrectly?

20 A. Maybe.

21 (Exhibit 155 was marked.)

22 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to  
23 hand you what's been marked as Exhibit 155. This is a  
24 Spanish language e-mail with English attachments behind  
25 it. Behind that is an English translation of the

[Page 151]

1 Do you recall that?

2 A. Yes.

3 Q. Okay. And there were some questions about your  
4 2007 tax return.

5 A. Yes.

6 Q. First of all, did you file tax returns in the  
7 US in 2006, 2007 and 2008?

8 A. Yes, I did.

9 Q. Okay.

10 A. Jointly with my husband.

11 Q. And when you testified that the 2007 tax return  
12 didn't -- didn't include the interest that you received  
13 from your CDs, you're referring to a tax return in the  
14 United States --

15 A. Yes.

16 Q. -- is that correct?

17 Now, you would agree with me that if you  
18 didn't pay taxes that were due, that would be wrong?

19 A. Exactly.

20 Q. And you mentioned that there is an accounting  
21 firm, you don't remember the name, that you believed  
22 didn't declare the -- these interest payments in 2007.

23 A. Yes.

24 9. You recall that?

25 Do you have information at your house that

[Page 159]

1 me and say: Don't buy that stuff because it's too  
2 expensive, things like that. I didn't want that.

3 MR. HAMPTON: That's all the questions I  
4 have. I appreciate your time today.

5 THE WITNESS: Okay. Thank you.

6 MR. HAMPTON: Are you not going to tell me  
7 that you enjoyed meeting me?

8 THE WITNESS: You are a very nice guy.

9 Okay.

10 MR. SWANSON: Yeah.

11 EXAMINATION

12 BY MR. BRINKMAN:

13 Q. Good afternoon, Ms. Suarez. My name is Taylor  
14 Brinkman and I represent HSBC. I'll be brief.

15 You testified earlier that you have given  
16 your son, Gabriel, a power of attorney to act on your  
17 behalf in all matters relating to Stanford, correct?

18 A. Yes. Not only Stanford, everything.

19 Q. Does that power of attorney also give Gabriel  
20 the ability to act on your behalf in this litigation?

21 A. I would say yes, in everything.

22 Q. And so Gabriel can make decisions for you with  
23 respect to this litigation, correct?

24 A. Correct.

25 Q. Do you have authority to make decisions with